

**EXHIBIT A**

**Emails regarding Proposed Order**

## RE: [npap-wellpath] Moving forward after the stay

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**From:** Lee, Catherine <clee@mwe.com>

Thu, May 22, 2025 at 9:59 AM CDT (GMT-05:00)

**To:** R. J. Shannon <rshannon@shannonleellp.com>; Kapp III, James <JKapp@mwe.com>; <zachary.hemenway@stinson.com>; Hemenway, Zachary H. <zachary.hemenway@stinson.com>

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Thanks, RJ. We are fine with your comments.

@Zach, we've been hearing from the Court this morning. We really need to get these orders on file today. Can you please send any comments you have by 2:00 pm CT?

CATHERINE LEE

Associate

**McDermott Will & Emery LLP** 444 West Lake Street, Suite 4000, Chicago, IL 60606-0029

**Tel** +1 312 899 7226 **Email** clee@mwe.com

**Website** | **vCard** | **LinkedIn**

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**From:** R. J. Shannon <rshannon@shannonleellp.com>

**Sent:** Wednesday, May 21, 2025 9:33 PM

**To:** Lee, Catherine <clee@mwe.com>; Kapp III, James <JKapp@mwe.com>; zachary.hemenway@stinson.com

**Subject:** RE: [npap-wellpath] Moving forward after the stay

[ External Email ]

All,

See the attached with some comments. They are:

Paragraph 4—I think Kapp is right about the Trust being the nominal party, but it is very confusing, and it seems like many courts get this wrong. I think the attached clarifies the issue while still using the term correctly.

New Paragraph 5—This is the main issue I've been seeing from my guys.

Thanks,  
R. J.

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**R. J. Shannon**

Partner

**Shannon & Lee LLP**

Direct: (346) 535-0515

Cell: (512) 693-9294

[rshannon@shannonleellp.com](mailto:rshannon@shannonleellp.com)

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**From:** Lee, Catherine <clee@mwe.com>

**Sent:** Wednesday, May 21, 2025 1:26 PM

**To:** R. J. Shannon <rshannon@shannonleellp.com>; Kapp III, James <JKapp@mwe.com>; [zachary.hemenway@stinson.com](mailto:zachary.hemenway@stinson.com)

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RJ,

Attached please find the draft order, subject to ongoing review. We believe this covers the concerns outlined

below.

Thanks,

CATHERINE LEE

Associate

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**Tel** +1 312 899 7226 **Email** clee@mwe.com

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**From:** Lee, Catherine

**Sent:** Wednesday, May 21, 2025 12:39 PM

**To:** R. J. Shannon <[rshannon@shannonleellp.com](mailto:rshannon@shannonleellp.com)>; Kapp III, James <[JKapp@mwe.com](mailto:JKapp@mwe.com)>; [zachary.hemenway@stinson.com](mailto:zachary.hemenway@stinson.com)

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The draft is in process. We will share it when it is ready.

CATHERINE LEE

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**From:** R. J. Shannon <[rshannon@shannonleellp.com](mailto:rshannon@shannonleellp.com)>

**Sent:** Wednesday, May 21, 2025 12:36 PM

**To:** Kapp III, James <[JKapp@mwe.com](mailto:JKapp@mwe.com)>; Lee, Catherine <[clee@mwe.com](mailto:clee@mwe.com)>; [zachary.hemenway@stinson.com](mailto:zachary.hemenway@stinson.com)

**Subject:** Fw: [npap-wellpath] Moving forward after the stay

**[ External Email ]**

All -- Would you mind sending me a copy of the draft stay order? The below is what my guys are running into and want the order to avoid.

R. J. Shannon

Shannon & Lee LLP

512-693-9294

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**From:** Torrey Hamilton <[tlh@hamiltonhennessy.com](mailto:tlh@hamiltonhennessy.com)>

**Sent:** Wednesday, May 21, 2025 12:26 PM

**To:** R. J. Shannon <[rshannon@shannonleellp.com](mailto:rshannon@shannonleellp.com)>

**Cc:** Hamilton Torri <[tlh@hamiltonhennessy.com](mailto:tlh@hamiltonhennessy.com)>; [npap-wellpath@nationallawyersguild.org](mailto:npap-wellpath@nationallawyersguild.org) <[npap-wellpath@nationallawyersguild.org](mailto:npap-wellpath@nationallawyersguild.org)>

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RJ— we appeared this morning and the Wellpath attorney told the Court that we cannot proceed against Wellpath but have to go through BK court. He also told our judge that Wellpath has not decided if it is going to indemnify its employees.

We — all of us— need a very clear order from

This BK judge that we can all take to our judges that all of us can understand. It needs also to specify what exactly we can proceed against Wellpath for—and what it means to be a nominal defendant.

Let me know if you can chat about this. No one can decipher the BK order including Wellpath's myriad of local counsel.

Sincerely,

*Torrey L. Hamilton*

HAMILTON LAW OFFICE, L.L.C.  
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*Sent from my mobile device, so please excuse my typos.*

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